

1 THE HONORABLE ROBERT S. LASNIK
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON

9 TOMMY BROWN, individually and on
10 behalf of all other persons similarly
11 situated;

12 Plaintiffs,

13 vs.

14 TRANSWORLD SYSTEMS, INC., et al.,

15 Defendants.

CASE NO. 2:20-cv-00680-RSL

PLAINTIFF'S REPLY TO THE
DEFENDANT TRUSTS'
OPPOSITION TO MOTION TO
REMAND (ECF 67).

NOTE FOR MOTION
CALENDAR:

October 16, 2020

I, Christina Henry, declare as follows:

1. I am an attorney for the Plaintiff Tommy Brown. I am knowledgeable
regarding the facts in this Declaration and am competent to testify to them.

2. Attached hereto as **Exhibit A** is a true and correct copy of the hearing
transcript for Osure Brown and Tommy Brown's Motion for Summary Judgment as
to Plaintiffs' Claims on October 24, 2019 in front of the Honorable Nicole Gaines
Phelps, filed in King County Superior Court Case No. 19-2-09402-8-KNT that is
the lead case that consolidates with the following cases: 19-2-09403-6-KNT, 19-2-
09404-4-KNT, 19-2-09405-2-KNT, 19-2-09406-1-KNT, 19-2-09407-9-KNT, 19-2-
09408-7-KNT, 19-2-09409-5-KNT, 19-2-09410-9-KNT, 19-2-09411-7-KNT, *National*

Collegiate Student Loan Trust(s) v. Osure Brown and Tommy Brown ("the State

PLAINTIFF'S REPLY TO THE DEFENDANT TRUSTS' OPPOSITION
TO MOTION TO REMAND (ECF 67) - 1

HENRY & DEGRAAFF, P.S.

787 MAYNARD AVE S

SEATTLE, WA 98104

V (206) 330-0595 / F (206) 400-7609

1 Court Action"). I represented Defendants Osure Brown and Tommy Brown, and I
2 personally attended the hearing before this court.

3. Attached hereto as **Exhibit B** is a true and correct copy of the filed copy
4 of the Order Granting Defendants Osure Brown and Tommy Brown's Motion for
5 Summary Judgment in the State Court Action.

6. I ask the Court to take judicial notice of the Order in *Daphne Smith v*
7 *Recordquest, LLC*, Case No. 2:19-v-0025-LA in the United States Court of Appeals for
8 the Seventh Circuit, entered on October 13, 2020 which is attached hereto as **Exhibit**
9 **C.**

10 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
11 UNITED STATES OF AMERICA AND THE STATE
12 Executed this 16th day of October 22020 at Bothell, WA.

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14 /s/ Christina L Henry
15 Christina Henry, WSBA 31273
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